

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

CELSIUS NETWORK LLC., *et al.*,¹

Post-Effective Date Debtors.

Chapter 11

Case No. 22-10964 (MG)

(Jointly Administered)

**RESPONSE TO KEITH NOYES’S MOTION
TO COMPEL DISCLOSURE OF LITIGATION OVERSIGHT
COMMITTEE MEMBER BIOGRAPHIES AND COMPENSATION**

The Litigation Oversight Committee,² by and through its undersigned counsel, states as follows with respect to Keith Noyes’s *Motion Seeking to Compel Disclosure of Litigation Oversight Committee Member Biographies and Compensation* [Docket No. 7430]:

1. The *Litigation Administrator Agreement* [Docket No. 4297, Ex. B] (the “**M3 Litigation Administrator Agreement**”) provides, in pertinent part, that within 45 days after the end of each calendar quarter, the Litigation Administrator shall make available a written report regarding, among other things, any “material information relating to the Post-Emergence Claims and the administration of the Post-Emergence Claims deemed appropriate by the Litigation Administrator, in its reasonable judgment.” M3 Litigation Administrator Agreement § 4.13.a.³

¹ The Post-Effective Date Debtors in these chapter 11 cases (the “**Chapter 11 Cases**”), along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 Ltd (1209); GK8 UK Limited (0893); and GK8 USA LLC (9450). The location of Post-Effective Date Debtor Celsius Network LLC’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030. In this motion, the Post-Effective Date Debtors shall sometimes be referred to collectively as “Celsius.”

² Capitalized terms used but not defined herein have the meanings ascribed to them in the *Modified Joint Chapter 11 Plan of Reorganization of Celsius Network LLC and Its Debtor Affiliates (Conformed for MiningCo Transaction)* [Docket No. 4289].

³ On April 30, 2024, the Litigation Administrator filed the first quarterly report in accordance with the M3 Litigation Administrator Agreement [Docket No. 4847].

2. As previewed at the July 29, 2024 omnibus hearing, the Litigation Administrator filed its latest quarterly report on July 31, 2024 [Docket No. 7568] (the “**Quarterly Report**”). That report discloses both the biographies of the LOC members (*see* Quarterly Report, Ex. A) and the compensation the LOC has paid to its members (*see* Quarterly Report at 4-5).

Dated: August 8, 2024
New York, New York

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